



Submission of Concerns and Complaints by Interested Parties other than Employees

Submission of complaints and concerns regarding Financial and Legal Matters may be submitted by individuals not employed by 1st CCU ("Interested Parties").

Interested Parties may communicate concerns and complaints regarding Financial and Legal Matters by regular mail sent to:

Mr. Anthony R. Gingrasso
205 Fifth Avenue South, Suite 600
P.O. Box 1626
La Crosse, WI 54602-1626

Treatment of Concerns and Complaints

Upon receipt of a concern or complaint relating to Financial and Legal Matters, from whatever source, the Credit Union's Attorney will, to the extent practicable, acknowledge receipt of the concern or complaint to the person who submitted it. Further, the Credit Union's Attorney will inform the Chairman of the Board of all reported concerns and complaints relating to Financial and Legal Matters as appropriate.

Investigations of Concerns and Complaints

The Chairman of the Board, with assistance from Credit Union's Attorney if so desired, will investigate any report regarding Financial and Legal Matters and concerns relating to defalcations, thefts or fraud (1) on his or her own, (2) with any other senior management employee of 1st CCU he or she deems appropriate, (3) outside counsel, or (4) an outside party, auditor or consultant he or she deems appropriate. The Board of Director's authority to investigate does not preclude an investigation by senior management or other appropriate persons.

Confidentiality will be maintained to the extent reasonably practicable, consistent with applicable law and policy. The need to conduct an adequate investigation may be necessary to determine resolution of the matter or corrective action.

Corrective Action

If the investigation of the concern or complaint indicates that a violation of law, regulations or policy has occurred, the Chairman of the Board may present the findings of the investigation to senior management who will determine appropriate disciplinary measures or other corrective action. Senior management shall inform the Chairman of the Board of its decision regarding disciplinary measures or corrective action prior to implementing such measures. The Chairman of the Board may confer with senior management regarding the appropriateness of the disciplinary measures or corrective action proposed.

Reporting and Retention of Matters and Investigations

The Chairman of the Board will maintain a log of all concerns and complaints that relate to Financial and Legal Matters and concerns relating to defalcations, thefts or fraud that are received. The Chairman of the Board shall track the receipt, investigation, and resolution of all such concerns and complaints, and the Chair shall provide periodic reports thereof to the Board of Directors.

Copies of records relating to concerns and complaints received will be maintained in accordance with 1st CCU's records retention policy.

Approved by the Board of Directors, October 19, 2022.